

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

**RONNIE W. WATKINS AND  
TERESA H. WATKINS,**

**PLAINTIFFS,**

**V.**

**UNION PACIFIC  
RAILROAD COMPANY,**

**DEFENDANT.**

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**CIVIL ACTION NO: 2-18-CV-00028**

**AGREED MOTION FOR EXTENSION OF TIME TO DESIGNATE EXPERTS**

Plaintiffs Ronnie W. Watkins and Teresa H. Watkins (“Plaintiffs”) and Defendant Union Pacific Railroad Company (“Union Pacific”) file this Agreed Motion for Extension of Time to Designate Experts, and in support thereof, respectfully show the Court the following:

**I. The parties jointly request that the Court continue the expert designation deadlines in this matter.**

1. The deadline for Plaintiffs to designate their experts is Friday, September 14, 2018. Union Pacific’s deadline is November 14, 2018.

2. The parties jointly request that the Court extend these expert designation deadlines by one month each. Specifically, the parties request that Plaintiffs’ expert designation deadline be extended to October 19, 2018, and that Union Pacific’s expert designation deadline be extended to December 21, 2018.

3. This request will not affect any other dates in the Court’s scheduling order.

4. The purpose of this extension is not for delay, but so that justice may be done.

## II. Conclusion

For the foregoing reasons, Plaintiffs and Union Pacific respectfully pray that the Court extend the expert designation deadlines as set forth herein.

Respectfully submitted,

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**Certificate of Service**

I certify that a true and correct copy of the foregoing motion was served on all parties of record via e-mail on September 13, 2018.

/s/ Mukul S. Kelkar

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**Via E-Mail and E-File**

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